Serial No. 09/748,757

-7-

Art Unit: 2153

REMARKS

Claims 1-3, 7, 8, 11-16, 18-20 and 22-28 are pending. New claim 29 is now added.

Claim 21 is now cancelled in response to the objection in the Office Action. Claims 1, 8, 12 and 22 are currently amended. Reconsideration is respectfully requested.

Claims 1-5, 7-9 and 11 were rejected under 35 U.S.C. §103(a) over Ishida in view of McCormack in further view of Wilson. Claims 1 and distinguish the cited combination because the storage device is both capable of direct connection with the network, i.e., not through a server, and is usable by any of a plurality of clients through the network. Ishida describes a hierarchical storage management device. Although a superficial comparison of Ishida's Fig. 1 with Figure 3 of this application might suggest similarities, the descriptions of those figures reveal that the ideas are distinct. Ishida is concerned with a hierarchical storage management (1). Although the hierarchical storage management system may be connected with a LAN, it is utilized by a single client. Col. 2, line 66 through col. 3, line 3. Wilson describes a network stack layer interface, and McCormack does not even describe networked storage. In contrast with the cited combination, the claimed invention is both capable of direct network connection, and shared use by a plurality of clients. For example, claim 1 recites "a SCSI Encapsulation Protocol control module coupled to the memory, the control module being operable to control transmission of data from the memory to any one of the plurality of clients via the power integrated network, and further to control storage of data received from any one of the plurality of clients via the power integrated network in the memory." Similarly, claim 8 recites "coupling a SCSI data storage device to the power integrated Ethernet network, the SCSI data storage device configured to communicate with any of a plurality of clients via the power integrated Ethernet network via a SCSI Encapsulation Protocol control module." Withdrawal of the rejections of claims 1 and 8 is

Serial No. 09/748,757

-8-

Art Unit: 2153

therefore requested. Claims 2-5, 7, 9 and 11 are dependent claims which further distinguish the invention, and which are allowable for the same reasons as their respective base claims.

Withdrawal of the rejections of claims 2-5, 7, 9 and 11 is therefore requested.

Claims 12, 14-16, 18, 19, 22-25, 27 and 28 were rejected over Saito in view of McCormack. Claim 12 distinguishes the combination of Saito and McCormack for the same reasons discussed above. In particular, claim 12 distinguishes the combination because the storage device is both capable of direct connection with the network, i.e., not through a server, and is usable by any of a phurality of clients through the network. This feature is recited in claim 12 as "a control module coupled to the memory, the control module for controlling the transmission of data from the memory to any of a phurality of clients via the first power integrated network and the storage of data received from any of a phurality of clients via the first power integrated network in the memory." Withdrawal of the rejection of claim 12 is therefore requested. Claims 14-16, 18, 19, 22-25, 27 and 28 are dependent claims (new claim 29 has been added with the language of cancelled claim 21 pursuant to the Examiner's objection) which further distinguish the invention, and which are allowable for the same reasons as claim 12. Withdrawal of the rejections of those claims is therefore also requested.

Serial No. 09/748,757

-9-

Art Unit: 2153

For these reasons, and in view of the above amendments, this application is now considered to be in condition for allowance and such action is earnestly solicited.

Respectfully Submitted,

Oct. 4, 2005 Date

Holmes Anderson, Reg. No. 37,272 Attorney/Agent for Applicant(s)

Steubing McGuinness & Manaras LLP

125 Nagog Park Acton, MA 01720 (978) 264-4001

Docket No. 120-167

Dd: 6/7/2005